Message

From: Buzzelle, Stanley [Buzzelle.Stanley@epa.gov]

Sent: 12/19/2014 9:03:43 PM

To: Riley, Jeffrey [Riley.Jeffrey@epa.gov]

CC: Tejada, Matthew [Tejada.Matthew@epa.gov]; Ruhl, Suzi [Ruhl.Suzi@epa.gov]

Subject: Follow-up on Harbor Bridge Review

Attachments: OEJ's Harbor Bridge Air Impact Questions.docx

Hi Jeff,

I'm following up on our previous conversation re: the Harbor Bridge FEIS air issues. I was wondering if you've had a chance yet to look into the issues we discussed (e.g., localized impacts and mitigation monitoring examples)? Any examples you've found where air monitoring was implemented would be a great help.

As I mentioned previously, I've developed a list of questions that OEJ is hoping you have some insight into. I've listed four main questions below and I've attached a document with some additional questions that we have regarding the sufficiency of the air impacts analyses for the Northside community. Any help that you can provide in answering these questions is greatly appreciated by Matt, Suzi, and me.

Given that the FEIS states there may be localized increases in MSAT emissions which would likely be most pronounced along highways sections adjacent to residential areas (e.g. Northside community) and also states that these impacts are predominantly borne by minority and low-income populations:

- 1. 1. Is it sufficient that the FEIS analyzed the change in emissions between the No Build and Preferred Alternative in general (added capacity) but did not analyze the change/impacts in air emissions that the Northside community will experience between the No Build and the Preferred Alternative?
- 2. Is it sufficient that the FEIS relied on national-level modeling for EPA air rules to mitigate air impacts to the Northside community?
- 3. Is it sufficient that the FEIS only conducted a regional-level quantitative MSAT analysis, rather than an analysis of localized impacts to the Northside community?
- 4. 4. Is it sufficient that the FEIS did not find any cumulative air impacts to a community located next to a port undergoing immense expansion and surrounded on all sides by two highways, a rail yard, and refineries, and which has a history of air emission concerns (benzene, PM)? Note: It does not appear that the cumulative impacts analysis took into account the additional truck and rail emission that will likely result from raising the bridge elevation (e.g. increased cargo from post-Panamax vessels). Can you confirm for me that this is the case?

In addition to understanding if the FEIS is deficient for the issues mentioned above, we would like to identify specific mitigation measures (e.g. air monitoring in the Northside community) that we can recommend be implemented.

I really appreciate your helping OEJ to better understand the air issues discussed above and the additional concerns that I've attached to this email. Please give me a call today or early next week to discuss these matters further. I can be reached on my cell at [EL. 6 Personal Privacy (PP)].

Regards, Stan